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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 VISHAL DASA,
RAMAKRISHNA REDDY KARRA
15 TUSHAR TAMBE
16 ANJI REDDY DIRISANALA,
17 Defendants.

Case No. 11-CR-742- (SBA)

STIPULATION AND [PROPOSED] ORDER
CONTINUING HEARING DATE TO MAY
1, 2012 AND EXCLUDING TIME UNDER
THE SPEEDY TRIAL ACT

Hearing Date: May 1, 2012
Time: 10:00 am

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20 **I. STIPULATION**
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22 The above-captioned matter is set on May 1, 2012 before this Court for a status hearing.
23 The parties jointly request that the Court continue the matter to July 3, 2012, at 10:00 a.m.,
24 before this Honorable Court, and that the Court exclude time under the Speedy Trial Act, 18
25 U.S.C. § 3161, between May 1, 2012 and July 3, 2012, so that the defense can have additional
26 time to review and assess the voluminous discovery in this case, including supplemental
27 discovery that the government plans to produce.
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On October 7, 2011, the United States Attorney filed a one-count Information charging

defendants with conspiracy to commit visa fraud in violation of 18 U.S.C. §§ 371 and 1546(a). On October 11, 2011, the defendants appeared before the magistrate court, waived Indictment and were arraigned. Defendants face a maximum sentence of five years imprisonment on this charge.

By way of background, this case is related to a larger investigation involving Tri-Valley University ("TVU"), which the government has alleged was a sham university that accepted foreign students and issued legal status for these students without requiring that they attend classes. *See* Indictment in *United States v. Susan Su*, CR 11-00288-SBA.

The four defendants charged in this related case request additional time to review the discovery that the government has already produced, which includes voluminous files from TVU computers that the government seized and that the defendants need to review. Additionally, the defense has requested that the government produce additional discovery relating to the broader investigation in this case, and the government has agreed to produce this discovery to defense counsel and needs additional time to gather the information.

The parties stipulate and agree that the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial. The parties further agree that the failure to grant this continuance would unreasonably deny counsel for defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and deny continuity of counsel. Accordingly, the parties agree that the period of time from May 1, 2012 to July 3, 2012, should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel and continuity of counsel, taking into account the exercise of due diligence.

It is so stipulated.

Dated: April 26, 2012

By: /s/
ANGELA HANSEN
Attorney for Defendant
VISHAL DASA

Dated: April 26, 2012

By: /s/
GINNY WALIA
Attorney for Defendant

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RAMAKRISHNA REDDY KARRA

Dated: April 26, 2012

By: /s/
KENNETH MCGUIRE
Attorney for Defendant
TUSHAR TAMBE

Dated: April 26, 2012

By: /s/
GALIA A. PHILLIPS
Attorney for Defendant
ANJI DIRISANALA

Dated: April 26, 2012

By: /s/
WADE RHYNE
HARTLEY WEST
Assistant United States Attorneys

II. ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS:

1. Given that this case is related to a larger investigation involving Tri-Valley University and the Indictment in *United States v. Susan Su*, CR 11-00288-SBA, and that the government produced discovery to defendants that includes voluminous computer files from the University that the defense needs to review;

2. Given that the defense has requested additional discovery and that the government is working to produce this discovery to the defense;

3. Given that a complete review of the discovery is necessary to the defense preparation of the case and that the failure to grant the requested continuance would unreasonably deny counsel for defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence;

4. Given that the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial;

Based on these findings, IT IS HEREBY ORDERED that the STATUS date of May 1, 2012, scheduled at 10:00 a.m., before the Honorable Sandra Brown Armstrong, is vacated and reset for July 3, 2012, at 10:00 a.m. It is FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), from May 1, 2012 to July 3, 2012.

IT IS SO ORDERED.

Dated: _____

SANDRA BROWN ARMSTRONG
UNITED STATES DISTRICT JUDGE